

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALI KANONGATAA, : x
Plaintiff, : ECF Case
: :
-against- : Case No. 1:16-cv-07382 (LAK)
: :
AMERICAN BROADCASTING COMPANIES, : **NOTICE OF MOTION TO**
INC. AND YAHOO! INC., : **DISMISS**
: :
Defendants. : :
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PLEASE TAKE NOTICE that defendants American Broadcasting Companies, Inc., and Yahoo! Inc. upon the accompanying Memorandum of Law, Declaration of Nathan Siegel and accompanying exhibits, and all prior pleadings and proceedings hereto, by its undersigned attorneys, hereby respectfully moves this Court, before the Honorable Lewis A. Kaplan, United States District Judge at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order dismissing the Complaint (Doc. No. 1, September 22, 2016) of Plaintiff Kali Kanongataa on the grounds that the allegations therein fail to state a claim upon which relief may be granted as a matter of law pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: November 21, 2016
Washington, D.C.

Respectfully submitted,

By: 

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*Counsel for Defendants American Broadcasting
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CERTIFICATE OF SERVICE

I, Dana R. Green, hereby certify that on November 21, 2016, I caused true and correct copies of Defendant ABC's Notice of Motion to Dismiss to be served via ECF upon:

Richard Liebowitz
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Attorney for Plaintiff



Dana R. Green